

Brian E. Ayers
CBIZ, Inc.
1065 Avenue of the Americas
New York, NY 10018
Telephone: 212-790-5813
Email: beayers@cbiz.com

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

CAMBRIDGE ANALYTICA LLC

Debtor.
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: Chapter 7
: Case No.: 18-11500 (SHL)
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**AFFIDAVIT OF BRIAN E. AYERS IN SUPPORT OF APPLICATION FOR AN ORDER
AUTHORIZING AND APPROVING THE EMPLOYMENT AND RETENTION OF
CBIZ ACCOUNTING, TAX & ADVISORY OF NEW YORK, LLC AND CBIZ
NATIONAL TAX OFFICE, LLC AS FINANCIAL ADVISORS
TO THE CHAPTER 7 TRUSTEE**

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

BRIAN E. AYERS, being duly sworn, deposes and says:

1. I am a Director of CBIZ Accounting, Tax and Advisory of New York, LLC ("CBIZ NY"), with offices at 5 Bryant Park at 1065 Avenue of the Americas, New York, New York, 10018. The facts set forth in this Affidavit are personally known to me and, if called as a witness, I could and would testify thereto. CBIZ NY and its affiliates with offices throughout the country are wholly owned subsidiaries of CBIZ, Inc. CBIZ, Inc. is a full service firm, and CBIZ NY intends to use resources from CBIZ National Tax Office, LLC ("CBIZ NTO") another wholly owned subsidiary of CBIZ, Inc. (CBIZ NTO and CBIZ NY are collectively referred to as "CBIZ") that provides services in a variety of tax areas.

2. This Affidavit is submitted in support of the application (the “Application”) of Salvatore LaMonica, the Chapter 7 Trustee (the “Trustee”), in the above-captioned, chapter 7 case of Cambridge Analytica LLC (the “Debtor”), to employ CBIZ as his financial advisors in these cases effective as of May 22, 2018. This Affidavit is also submitted as the statement required pursuant to sections 327(a) and 328(a) of title 11 of the United States Code (the “Bankruptcy Code”), Rules 2014(a) and 2016(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”).

3. Other than the initial communication between CBIZ and representatives of the Trustee with respect to the retention of CBIZ in these cases, neither I nor, to the best of my knowledge, any other member or employee of CBIZ had any business, or other connection, with the Debtor, their attorneys or financial advisor, or any other party in interest, except as disclosed herein.

4. CBIZ has conducted an examination to determine whether it has any relationships with entities (each an “Interested Party” and, collectively, the “Interested Parties”) that are associated with the Debtor’s case. Specifically, under my supervision, an employee of CBIZ conducted a conflict check on the following parties-in-interest in these cases: (i) the Debtor; (ii) the Debtor’s known officers, directors, related parties and professionals; (iii) the Debtor’s creditors’ matrix (as filed with the Debtor’s petition); (iv) the United States Southern District of New York judge appointed to the case; (v) the United States Trustee; and (vi) any person employed by the United States Trustee.

5. CBIZ is a disinterested party within the meaning of 11 U.S.C. § 327(a), that CBIZ nor any member of CBIZ neither holds nor represents any interest adverse to the estate.

6. Based on the results of our conflict check, to the best of my knowledge, it appears that CBIZ does not represent any entity holding any interest adverse to, and has no connection

with, the Debtor, the Debtor's creditors or any party-in-interest herein, and is a "disinterested person" within the meaning of section 101(14) of the Bankruptcy Code, except that CBIZ: (a) works with and/or for the professionals in these chapter 7 cases, or other chapter 7 or 11 cases, including Salvatore LaMonica, the Chapter 7 Trustee, and LaMonica Herbst & Maniscalco, LLP, the Chapter 7 Trustee's law firm; and (b) LHM is retained by Esther DuVal, a Senior Managing Director at CBIZ, in her capacity as the Chapter 11 Trustee in the Gallant Capital Markets and Avenica Inc., matters¹.

7. To the best of my knowledge, CBIZ is a "disinterested person" as that term is defined in 11 U.S.C. § 101(14) in that CBIZ: (a) is not a creditor, an equity security holder, or an insider of the Debtor; (b) is not and was not, within 2 years before the date of the filing of the petition, a director, officer, or employee of the Debtor; and (c) does not have an interest materially adverse to the interest of the Debtor's estates or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtor or for any other reason.

8. To the best of my knowledge and except as set forth herein, CBIZ, has no connection to the Debtors, the Debtor's creditors, other parties in interest, their attorneys and accountants, the United States Trustee or any person employed by the United States Trustee.

9. Based on the foregoing, CBIZ does not believe that it is conflicted from acting as financial advisors to the Trustee in these cases. To the extent that I discover any facts bearing on the matters described herein during the period of CBIZ's retention, I will supplement the information contained in this Affidavit.

10. CBIZ will assist the Trustee with the following:

¹ The Gallant Capital Markets and Avenica Inc., matters are chapter 11 cases filed in the Eastern District of New York, their case numbers are 17-41814 (ESS) and 17-41813 (ESS), respectively.

- a) Assisting the Trustee in marshaling and liquidating the Debtor's assets;
- b) Assisting the Trustee with the safeguarding and maintenance of the Debtor information technology systems and data integrity;
- c) Performing an investigation and analyses of potential recovery of chapter 5 claims, including analyzing transactions with vendors, insiders, related and/or affiliated companies, for the period prior to the date of filing chapter 7;
- d) Analyzing the financial information of the Debtor for the period prior to the date of filing chapter 7;
- e) Scrutinizing cash disbursements for the period prior to the date of filing chapter 7;
- f) Preparing federal, state, and local tax returns and requisite disclosures on behalf of the Trustee and the Debtor's estates, as requested by the Trustee;
- g) Reconciling filed proofs of claim, as requested by the Trustee; and
- h) Performing services necessary to preserve the assets of the Debtor's estates, as requested by the Trustee.

11. CBIZ is willing to serve as financial advisors to the Trustee and to receive compensation on an hourly basis. CBIZ will apply to the Court for allowance of compensation and reimbursement of expenses in accordance with applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, and the Amended Guidelines for Fees and Disbursements for Professionals in the Southern District of New York, dated June 17, 2013.

12. The current hourly rates charged by CBIZ for professional services are as follows:

Directors and Managing Directors	\$435 to \$795 per hour
Managers and Senior Managers	\$355 to \$435 per hour
Senior Associates and Staff	\$175 to \$355 per hour

Periodically, our hourly rates are subject to firm-wide adjustment. CBIZ will file a supplemental affidavit with the Court should its hourly rates change.

13. CBIZ has not agreed and will not agree to share compensation received in connection with these cases with any other person, except as permitted by section 504(b) of the Bankruptcy Code and Bankruptcy Rule 2016.

14. Neither I, nor CBIZ, nor any managing director or associate thereof has received or been promised any compensation for services rendered or to be rendered in any capacity in connection with these cases, other than as permitted by the Bankruptcy Code, the Bankruptcy Rules and the Local Bankruptcy Rules for the Southern District of New York.

15. No agreement or understanding exists between CBIZ and any other person for a division of compensation paid or to be paid for services rendered in this case and no such division shall be made.

WHEREFORE your deponent asks for an appropriate order approving the employment of CBIZ as financial advisors to the Trustee effective as of May 22, 2018.



Brian E. Ayers, Director
CBIZ Accounting, Tax and Advisory of New York, LLC

Sworn to and subscribed to before
me this 19 day of July 2018



Notary Public

GERRI GARELICK
NOTARY PUBLIC-STATE OF NEW YORK
No. 01GA6061930
Qualified In Kings County
My Commission Expires 07-23-2021